

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

<p>RODNEY TYGER and SHAWN WADSWORTH, on behalf of themselves and those similarly situated,</p> <p style="text-align: center;">Plaintiffs,</p> <p>v.</p> <p>PRECISION DRILLING CORP., PRECISION DRILLING OILFIELD SERVICES, INC., PRECISION DRILLING COMPANY, L.P., and JOHN DOES 1-10,</p> <p>Defendants.</p>	<p>Case No. 4:11-cv-01913</p> <p>(Judge Matthew W. Brann)</p>
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**JOINT MOTION FOR APPROVAL OF FLSA COLLECTIVE ACTION
SETTLEMENT**

For the reasons set forth in the attached Memorandum of Law in Support of this Motion, Named Plaintiffs Rodney Tyger and Shawn Wadsworth, on their own behalf and behalf of all Opt-In Plaintiffs (hereinafter “Plaintiffs”) and Defendants Precision Drilling Corp., Precision Drilling Oilfield Services, Inc., and Precision Drilling Company, L.P. (hereinafter “Defendants”), jointly request that this Court enter an Order:

1. Granting Approval of the Partial FLSA Settlement Agreement

(“Settlement”), attached as Exhibit 1-A to the Declaration of Justin L. Swidler, Esquire, filed in connection with the Memorandum of Law in support of this Motion;

2. Ordering Defendant to wire the Gross Settlement Amount of \$410,000 (the “Gross Settlement Fund”) to the qualified settlement fund administrator (“Claims Administrator”) within fifteen (15) calendar days following the Court’s entry of an order approving the Settlement, pursuant to paragraph 4(b) of the Settlement;

3. Awarding service payments of \$1,500 each for Named Plaintiffs Rodney Tyger and Shawn Wadsworth, as payment for services performed for the class, pursuant to paragraph 4(a) of the Settlement, to be paid from the Gross Settlement Fund;

4. Awarding service payments of \$150 each of the non-Named Plaintiffs who were deposed by Defendants, as payment for services performed for the class, pursuant to paragraph 4(a) of the Settlement, to be paid from the Gross Settlement Fund;

5. Granting Class Counsel’s request for reimbursement for half of their reasonable litigation costs, \$55,256, to be paid from the Gross Settlement Fund;

6. Granting Class Counsel 1/3 of the Gross Settlement Fund as reasonable fees for the services performed in connection with the Settlement, to be

paid from the Gross Settlement Fund.

7. Granting the Claims Administrator its reasonable fees and costs incurred in administering the Settlement, pursuant to paragraph 4(a) of the Settlement, to be paid from the Gross Settlement Fund;

8. Ordering the Claims Administrator to distribute the Settlement to all class members consistent with the Settlement; and

9. Dismissing with prejudice Plaintiffs' claims in this lawsuit alleging that Defendants failed to pay for time spent by collective action members in post-shift changeover meetings.

Respectfully submitted,

/s/ Justin L. Swidler

Justin L. Swidler, Esq.

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